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Attorneys for Defendants Chicago Title
Insurance Company

DARE INVESTMENTS, LLC, a Utah limited
liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE COMPANY, a
Missouri domiciled insurer; HORIZON TITLE
AGENCY, Inc., a New Jersey domiciled company;
CHICAGO TITLE RICO ENTERPRISE, a
racketeering enterprise,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Case Action No.2:10-CV-06088(DRD)(MAS)

**CERTIFICATION OF JONATHAN M.
SANDLER, ESQ. IN SUPPORT OF
CHICAGO TITLE INSURANCE
COMPANY MOTION FOR REVOCATION
OF PRO HAC VICE ADMISSIONS AND
DISQUALIFICATION OF COUNSEL**

**MOTION RETURN DATE:
JANUARY 17, 2012**

I, JONATHAN M. SANDLER, hereby certify as follows:

1. I am an attorney-at-law admitted to practice in the United States District Court for the District of New Jersey and am an associate of the law firm of Riker, Danzig, Scherer, Hyland & Perretti LLP, attorneys for Chicago Title Insurance Company ("Chicago Title") in the above-referenced matter. As such, I am fully familiar with the facts stated herein based upon personal knowledge. I make this certification in support of Chicago Title's Reply Brief in Further Support of its Motion for Revocation of Pro Hac Vice Admissions and Disqualification of Counsel.

2. During a conversation between Peter Strojnik ("Strojnik Sr.") and Derrick R. Freijomil, in which I was present, Strojnik Sr. requested that attorneys for Chicago Title refrain

from deposing witnesses in this litigation during the month of December 2011 because he was asked by his wife to take off that month. He never mentioned that his wife had a medical condition or that she would be going for treatment during the month of December 2011.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: January 10, 2012



JONATHAN M. SANDLER